



National Council of Women of New Zealand

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Wahine O Aotearoa

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Submission to the NZ Food Safety Authority on the Domestic Food Review Transition Policy and Related Implementation

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 38 nationally organised societies. It has 32 branches throughout the country attended by representatives of these societies and 150 other organisations and individual members.

The function of NCWNZ is to work for the well-being of women, the family and the community at local, national and international levels through research, study, discussion and action.

General Comments

The Council as the spokesperson for the women's groups has had a long term interest in the development of Food Safety Standards and has written a number of submissions relating to food products-safety and suitability as well as development of standards and transitional arrangements over many years. Primarily NCWNZ's concern has been with the protection/management of health and safety risks from a consumer perspective.

NCWNZ has appreciated the opportunity to keep our members informed of the work being undertaken by the New Zealand Food Safety Authority (NZFSA) and values the involvement. Representatives from NCWNZ have attended workshops and stakeholder meetings since work started on the review of the food regulatory programme.

By delivering on the key policies and objectives in the Domestic Food Review, NCWNZ believes that the NZFSA - as the country's main food regulator - will provide greater protection for the consumer by ensuring the safety and suitability of food.

The Domestic Food Review - Discussion Document was circulated to the nucleus Consumer Affairs Committee and other interested members of NCWNZ seeking responses and views on the Transition and Related Implementation.

Responses from members included

- Agreement that the new regulatory regime should be "as cost-effective as possible while improving efficiency and effectiveness and ensuring safety and suitability of food" for the New Zealand consumer. Some concern was expressed that costs would increase in the transition phase and following registration and be passed on to the consumer.
- Agreement that training to meet the requirements of Food Control Plans and National Programmes should be the responsibility of individual businesses with support of an industry training organisation - to reduce the change of increased costs of products, foods and services.
- Responses supported the transition proposals with implementation of policy and registration over 5 years and agreed this would allow 'persons' time to change in a measured way.





- Some responses considered it imperative to maintain surveillance and control during the transition and implementation phases in order to ensure the reduction of food-borne illnesses and provide a regime that ensures safe and suitable food for the consumer. There was concern expressed that interim arrangements may not protect the consumer.
- Support was given for the preparation and introduction of Food Handler Guidance criteria from the earliest possible time in the transition sequence - as no specific transitional arrangements are proposed. Responses related to food primarily sold/served in infrequent event-based situations such as charity/community/fundraising functions and purposes where food is prepared on site or off site and transported. It was considered these events may provide increased risk of food-borne illness to the consumer.
- Some responses commented on the Food Sector (Table 2.2)
 - Providers to vulnerable populations
 - Food service - live-in or 24-hour care
 - Retailers and food services - day care
 - Retailers and food services - hospitalsproposed for Registration in Year 2 of transition, should be recognized for registration in Year 1 - as they were considered priority groups.
- Other responses commented on and suggested that Food Sector (Table 3.3) Food service - mobile food services and Food retailer - makes, handles and retails food proposed for Registration in Year 3 of transition should be reconsidered for Registration in Year 2. It was considered that these Food Sectors may be contributing to the 'significant and rising' incidence of food-borne illness in New Zealand.

NCWNZ applauds the Government for undertaking the establishment of a new food regulatory regime and development of the transitional policy in order to prepare for and implement the new system and believe the new Act which will replace the Food Act 1981 is timely.

NCWNZ thanks the NZFSA for the opportunity to comment on the Domestic Food Review - Discussion Document and would welcome ongoing involvement in any outcomes of this review.

Christine Low
President

Jan Brown
Convener, Consumer Affairs Standing Committee